

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**TENTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
OCTOBER 1, 2023 THROUGH NOVEMBER 30, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	10/01/2023	11/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$406,582.40 ¹ (80% of \$508,228.00)	
Total Reimbursable Expenses Requested in this Statement:	\$31,127.75 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$483,174.50	
Total Actual Attorneys Hours Covered by this Statement:	1025.6	
Average Hourly Rate for Attorneys:	\$471.11	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$25,053.50	
Total Actual Paraprofessional Hours Covered by this Statement:	88.2	
Average Hourly Rate for Paraprofessionals:	\$284.05	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Tenth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from October 1, 2023 through November 30, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$406,582.40 (80% of \$508,228.00) as compensation for professional services rendered to the Debtor during the period from October 1, 2023 through November 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$31,127.75, for a total amount of \$437,710.15 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhlhp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$508,228.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$31,127.75 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$437,710.15 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX

Dated: December 21, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on December 21, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	19,996.59
Online Research	1.20
Court Fees	596.00
Delivery Services/Messengers	101.72
Litigation Support Vendors	9,945.00
Outside Printing	182.25
Other Professionals	304.99

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	53.8	23.7
B120 Asset Analysis and Recovery	8.9	0.00
B130 Asset Disposition	12.2	2.5
B140 Relief from Stay/Adequate Protection	0.3	0.00
B150 Meetings of & Communications with Creditors	3.1	0.0
B160 Fee/Employment Applications	44.1	30.7
B170 Fee/Employment Objections	1.4	8.2
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	5.8	5.9
B190 Other Contested Matters	632.1	26.4
B195 Non-Working Travel	38.5	0.00
B210 Business Operations	42.4	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	1.7	0.00
B240 Tax Issues	30.5	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	10.4	2.2
B320 Plan and Disclosure Statement	140.4	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	1025.6	99.6

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

November 30, 2023

Invoice # 768639

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$508,228.00
Current Invoice Total Expenses	<u>\$31,127.75</u>
Current Invoice Total	<u>\$539,355.75</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 768639 and any other invoice numbers being paid on your remittance.

Jones, Alex "AJ"

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Client # 50134

Invoice # 768639

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF PREVIOUS UNPAID INVOICES

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
761699	06/30/2023	341,921.51	-31,548.08	310,373.43
761700	07/31/2023	214,254.82	0.00	214,254.82
761722	08/31/2023	493,188.66	0.00	493,188.66
763441	09/29/2023	320,869.84	0.00	320,869.84
765083	10/31/2023	218,303.57	0.00	218,303.57
TOTALS:		<u>\$1,588,538.40</u>	<u>\$-31,548.08</u>	<u>\$1,556,990.32</u>

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Responsible Attorney

Vickie L. Driver

Post - petition

09/01/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
09/14/2023	V. Driver	B195/	Travel home (billed at half time 3.0).	1.50
10/01/2023	V. Driver	B195/	Travel to Austin for deposition (billed at half time 3.0)	1.50
10/01/2023	D. Harlan	B190/	Perform research and analysis regarding Texas trust law.	0.80
10/01/2023	D. Harlan	B190/	Perform document review.	10.30
10/02/2023	L. Dauphin	B190/	Perform tasks for document review.	0.10
10/02/2023	V. Driver	B210/	Call with FSS counsel on book signing issues (.4); call with client on FSS operations and book sale details (1.1).	1.50
10/02/2023	V. Driver	B310/	Calls with FSS counsel on admin claim issues (.4); calls with SubV trustee's counsel regarding admin claim (.6); analyze strategy regarding admin claim issues (1.3).	2.30
10/02/2023	D. Harlan	B190/	Research and analyze privilege issues	0.50
10/02/2023	D. Harlan	B190/	Perform analysis regarding deposition and related transcript.	4.60
10/02/2023	D. Harlan	B320/	Perform and analyze research regarding plan issues.	4.30

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Vickie L. Driver

Post - petition

10/02/2023	C. McDonald	B120/	Draft correspondence regarding spendthrift provisions in AEJ 2018 trust (.2); trust review regarding same (.2).	0.40
10/02/2023	C. Stephenson	B120/	Review and analyze correspondence regarding trust issues (1.4); review related research memo (.8).	2.20
10/02/2023	C. Stephenson	B190/	Review and respond to correspondence regarding Debtor 2004 exam issues.	0.80
10/02/2023	C. Stephenson	B190/	Review Debtor deposition and analyze issues regarding same.	2.70
10/02/2023	C. Stephenson	B310/	Review and analyze Response to Application for Administrative Expenses.	0.80
10/03/2023	V. Driver	B190/	Attend Dr. Jones 2004 examination.	5.30
10/03/2023	V. Driver	B210/	Emails with Committee counsel on employment agreement resolution (.4); analyze research issues with book signing and send emails to FSS counsel on same (.8); review and revise stipulation resolving employment Agreement and send to SubV Trustee and FSS counsel with explanatory email and preview same with Sub V Trustee (1.1).	2.30

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Post - petition

10/03/2023	V. Driver	B310/	Review objection to admin claim (.7); analyze and develop issues needed to address in reply; (.8) email to Sub V Trustee and FSS counsel on issues with admin claim objection (.6); call with TX counsel on admin claim (.5).	2.60
10/03/2023	V. Driver	B320/	Emails and calls discussing exit strategies for Debtor.	2.30
10/03/2023	D. Harlan	B190/	Printing, arranging, and marking up deposition transcripts	0.70
10/03/2023	D. Harlan	B190/	Prepare new discovery production.	2.20
10/03/2023	D. Harlan	B210/	Westlaw research and communications re autopen.	1.10
10/03/2023	D. Harlan	B210/	Perform discovery and interrogatory requests regarding employment agreement.	5.80
10/03/2023	D. Harlan	B230/	Review cash collateral orders.	0.50
10/03/2023	C. Stephenson	B110/	Attend conference call with multiple parties in interest regarding various case matters and discussion of same.	1.30
10/03/2023	C. Stephenson	B185/	Review and revise Stipulation regarding Motion to Reject Contract.	1.70
10/03/2023	C. Stephenson	B310/	Draft Reply to Response to Administrative Expense Application.	0.80
10/04/2023	V. Driver	B190/	Meeting with Sub V Trustee and counsel on outstanding issues.	3.20

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Responsible Attorney

Vickie L. Driver

Post - petition

10/04/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
10/04/2023	V. Driver	B195/	Travel from Austin to Dallas (billed at half time 3.2) 1.6	1.60
10/04/2023	V. Driver	B310/	Meeting with FSS and client on admin claim and other case resolutions.	3.90
10/04/2023	D. Harlan	B110/	Attend meeting with Sub V trustee.	1.60
10/04/2023	D. Harlan	B190/	Perform document review.	4.80
10/04/2023	D. Harlan	B210/	Prepare draft agreement for Jones' salary.	0.30
10/04/2023	E. Weaver	B110/	Draft amended Schedule G, Executory Contracts to include Mint Studios.	0.80
10/04/2023	E. Weaver	B110/	Review and respond to correspondence regarding reports.	0.30
10/04/2023	E. Weaver	B130/	Draft schedule of identified personal property to attach to the sale motion.	2.00
10/05/2023	V. Driver	B110/	Call with client on overall case strategy and issues.	0.50
10/05/2023	V. Driver	B130/	Emails and calls on asset sale listing, valuations and grounds for same and notice procedures on same.	1.10
10/05/2023	V. Driver	B210/	Call with client on meetings with CRO for FSS and proposed resolutions to certain contested issues.	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

10/05/2023	D. Harlan	B190/	Perform document review.	7.50
10/06/2023	V. Driver	B130/	Call analyze asset listing and support for same.	0.90
10/06/2023	V. Driver	B190/	Call with client discussing multiple issues (.5); emails regarding deposition (.3); emails regarding UCC requests for valuation of PQPR (.2).	1.00
10/06/2023	V. Driver	B210/	Call with client discussing resolutions to FSS operational issues (.6); call with counsel for FSS regarding same (.8); correspondence regarding same (.8).	2.20
10/06/2023	V. Driver	B320/	Call with Committee and Plaintiff's counsel regarding case resolution matters.	1.60
10/06/2023	D. Harlan	B190/	Prepare file for R.. Schleizer's deposition preparation.	3.80
10/06/2023	D. Harlan	B190/	Work on doc review	7.10
10/06/2023	D. McClellan	B190/	Review and analyze court's orders on dischargeability	1.90
10/06/2023	D. McClellan	B190/	Develop strategy with dischargeability team.	2.50
10/06/2023	D. McClellan	B190/	Review and analyze research regarding appeal issues.	1.90
10/06/2023	C. Stephenson	B190/	Review and respond to correspondence regarding deposition matters for A. Jones.	1.30

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Responsible Attorney

Vickie L. Driver

Post - petition

10/06/2023	E. Weaver	B130/	Telephone call with BlackBriar Advisors regarding asset list and appraisals for sale motion.	0.50
10/06/2023	E. Weaver	B190/	Compile exhibits to AJ deposition.	0.50
10/06/2023	E. Weaver	B310/	Review claims register and continue downloading claims.	1.20
10/07/2023	D. Harlan	B190/	Perform document review.	7.60
10/08/2023	V. Driver	B130/	Provide asset listing with values for sale order to UCC.	0.40
10/08/2023	V. Driver	B210/	Calls with client regarding issues with FSS and whiskey deal (.8); research and send whiskey contract to FSS counsel confirming split (.6).	1.20
10/08/2023	D. Harlan	B190/	Perform document review.	8.10
10/09/2023	N. Collins	B240/	Communicate with CPA regarding calculation basis, holding period, gain or loss and other tax attributes upon disposition of certain in-kind property.	1.30
10/09/2023	L. Dauphin	B190/	Prepare supplemental client document production.	1.00
10/09/2023	V. Driver	B120/	Draft correspondence regarding homestead exemption issues.	0.20
10/09/2023	V. Driver	B130/	Draft correspondence regarding asset listing issues with UCC and BBA.	0.30

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Responsible Attorney

Vickie L. Driver

Post - petition

10/09/2023	V. Driver	B160/	Review messages from client on bill review issues (.2); sending Reynal statements for inclusion in reporting for client (.2); review fee statements from UCC counsel and emails regarding same. (.4).	0.80
10/09/2023	V. Driver	B190/	Call with E. Taube on document from Dr. Jones' deposition (.4); emails with UCC regarding same (.3); send to Dr. Jones' counsel for review (.2).	0.90
10/09/2023	V. Driver	B210/	Review and respond to correspondence from parties seeking meeting to discuss plan confirmation and operational issues (.4); call with FSS counsel on same (.8); call with financial advisors on same (.9; calls with client regarding same (.4); review correspondence regarding MugClub income (.2); draft correspondence regarding Red balloon executed contract to FSS counsel for approval by court (.2).	1.20
10/09/2023	D. Harlan	B160/	Draft N. Pattis's second motion for appointment as special counsel.	3.80
10/09/2023	D. Harlan	B190/	Perform document review.	5.10
10/09/2023	D. Harlan	B190/	Perform document review.	0.50

Jones, Alex "AJ"

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Responsible Attorney
Vickie L. Driver

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10/09/2023	D. Harlan	B190/	Perform document review.	1.60
10/09/2023	D. Harlan	B210/	Review and analyze research regarding security expenses.	0.30
10/09/2023	E. Weaver	B110/	Procure executed trust agreement for the homestead and circulate to team and John Lammert.	0.30
10/09/2023	E. Weaver	B160/	Prepare professional fee notebooks for all professionals in the case for review by client and financial advisors.	6.00
10/10/2023	N. Collins	B240/	Evaluate federal income tax reporting requirements of gratuitous transfers to debtor or debtor-related entities (1.1); communicate with CPA and outside advisors regarding tax reporting with respect to such transfers (.8)	1.90
10/10/2023	V. Driver	B190/	Call with UCC On discovery issues (1.1); follow up on same (.2); call with various parties in pending litigation and discovery requests from UCC (.8).	2.10
10/10/2023	V. Driver	B320/	Analyzing plan structure issues.	1.40
10/10/2023	D. Harlan	B150/	Discovery call with UCC.	0.50
10/10/2023	D. Harlan	B190/	Perform research and analysis.	1.50
10/10/2023	D. Harlan	B190/	Perform document review.	4.30

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Responsible Attorney

Vickie L. Driver

Post - petition

10/10/2023	E. Weaver	B160/	Email correspondence to and from The Reynal Law Firm regarding invoices since employment date (.2); compile all invoices, prepare a summary of same and circulate to team (.6).	0.80
10/11/2023	V. Driver	B120/	Analyze declination letter from appraisal district on homestead application (.2); correspondence with tax protester on same (.2); seek notarizing trust document (.4); calls with D. Minton and office on same (.8).	1.60
10/11/2023	V. Driver	B160/	Review and revise second application to employ Pattis for ancillary matters (.9); Messages with A. Reynal on potential engagement on Texas ancillary issues and terms of same (.6); Correspond with client on same (.3)	1.80
10/11/2023	D. Harlan	B160/	Edit Pattis second employment application and draft declaration.	2.80
10/11/2023	D. Harlan	B160/	Finalize Pattis declaration, application and order.	0.80
10/11/2023	D. Harlan	B190/	Call re Proton production	0.10
10/11/2023	D. Harlan	B190/	Draft correspondence regarding Taube document.	0.30
10/11/2023	D. Harlan	B190/	Draft email re ROGs	0.10

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Post - petition

10/11/2023	D. Harlan	B190/	Perform document review.	3.00
10/12/2023	N. Collins	B240/	Analyze transaction records substantiating basis of in-kind property for 2022 federal tax reporting (4.7); communicate with CPA and outside advisors regarding basis records for debtor (1.2)	5.90
10/12/2023	N. Collins	B240/	Perform analysis regarding Bitcoin transaction.	1.00
10/12/2023	V. Driver	B160/	Review and analyze submission of Martin and Reynal monthly fee statements for calculation of AJ post-petition liability for approved fees and expenses (.7).	0.70
10/12/2023	V. Driver	B210/	Meeting with financial advisors on professional fee budgeting (.8); review emails on book revenue issues, shipment status, and pre-sale status (.3); review book revenue on royalties and email (.2); preparation for meeting with FSS on operational issues (.7).	2.00
10/12/2023	V. Driver	B240/	Calls with tax counsel and reviewing crypto basis research and analysis for reporting requirement compliance (.9); email to committee on issue with filing tax return promptly (.1).	1.00
10/12/2023	D. Harlan	B160/	Final review of Pattis app and declaration.	1.20

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Responsible Attorney

Vickie L. Driver

Post - petition

10/12/2023	D. Harlan	B190/	Perform document review.	2.40
10/12/2023	E. Weaver	B160/	Compile Akin Gump fee statements and circulate to BlackBriar Advisors and team.	0.20
10/12/2023	E. Weaver	B190/	Review joint notice regarding agreed order on compromise and settlement and docket dates and deadlines related to same.	0.30
10/13/2023	N. Collins	B240/	Perform analysis regarding Bitcoin transaction.	1.00
10/13/2023	N. Collins	B240/	Draft memorandum regarding IRS rules relating to the calculation gain or loss on dispositions of in-kind property (3.8); communicate with the CPA and outside advisors regarding supporting documentation for federal income tax purposes (1.9)	5.80
10/13/2023	V. Driver	B130/	Calls with client to discuss sale of real property.	1.10
10/13/2023	V. Driver	B195/	Travel from Austin. (half time 3.4)	1.70
10/13/2023	V. Driver	B210/	All hands meeting with Sub V Trustee and counsel, FSS and counsel, BBA and client on exit strategies and operational issue discussions (2.4); calls with FSS counsel on related operational issues and offers (.9)	3.30

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10/13/2023	V. Driver	B240/	Call with tax counsel regarding updates on crypto taxation and basis research and updating team on same.	0.70
10/13/2023	V. Driver	B320/	Meeting with SubV trustee and counsel to discuss plan strategies.	1.50
10/13/2023	D. Harlan	B190/	Perform document review.	0.50
10/13/2023	C. Stephenson	B110/	Prepare for and attend all hands case meeting to discuss various case matters.	3.60
10/13/2023	C. Stephenson	B195/	Travel from Austin to Dallas (4.0 billed at half time).	2.00
10/13/2023	J. Yoon	B240/	Email and call Travis County Attorneys' office regarding debtor-related entity and tax issues	0.40
10/14/2023	V. Driver	B130/	Calls with client discussing real property sales.	0.60
10/14/2023	D. Harlan	B190/	Perform document review.	3.00
10/15/2023	V. Driver	B160/	Calls to discuss legal and professional fee budget and meetings to discuss same.	0.40
10/15/2023	D. Harlan	B190/	Perform document review.	2.90
10/16/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.50
10/16/2023	V. Driver	B130/	Calls on client case and moving sale process forward (1.4); analyze agents to hire and process to sell real property (.6).	2.00

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10/16/2023	D. Harlan	B160/	Work on motion to employ broker and accompanying order.	3.50
10/16/2023	D. Harlan	B190/	Perform document review.	7.30
10/16/2023	J. Yoon	B240/	Analyze and review pertinent pleadings and Travis County public records in preparation for call with Travis County Attorneys' Office (0.5); call with assistant Travis County attorney regarding the same (0.5); email Travis County attorney regarding Rule 11 agreement (0.3).	1.30
10/17/2023	N. Collins	B240/	Analyze documentation and local tax renditions of a debtor-related entity.	1.20
10/17/2023	V. Driver	B130/	Review and revise order on personal property sale.	0.40
10/17/2023	V. Driver	B160/	Review and preparing Pattis second application and declaration.	0.60
10/17/2023	V. Driver	B190/	Review interrogatories and send to person with knowledge of crypto information.	0.30
10/17/2023	D. Harlan	B110/	Draft case planning calendar.	2.10
10/17/2023	D. Harlan	B130/	Draft order for motion authorizing sale of personal property.	2.20
10/17/2023	D. Harlan	B160/	Draft secondary edits to Pattis employment application and accompanying declaration and order.	0.60
10/17/2023	D. Harlan	B160/	Finalize broker application.	1.10

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10/17/2023	D. Harlan	B190/	Perform document review.	2.10
10/17/2023	C. Stephenson	B160/	Review and respond to correspondence regarding broker employment and property sales.	0.80
10/17/2023	E. Weaver	B110/	Review profit and loss summary/spreadsheet for FSS and circulate to team.	0.50
10/17/2023	J. Yoon	B240/	Analyze and review personal property tax issues with debtor-related entity, Austin Shiprock Publishing, LLC.	0.80
10/18/2023	L. Dauphin	B190/	Assist with identification of key email questioned by opposing counsel.	0.10
10/18/2023	V. Driver	B110/	Call with BBA regarding MOR disclosures (.7); Call with client on general status of case and related issues (.8).	1.50
10/18/2023	V. Driver	B130/	Call to discuss issues with potential asset sale.	0.70
10/18/2023	V. Driver	B160/	Call with N. Pattis on need to expand role regarding subpoenas in various jurisdictions (.4); review and revise app to expand powers and send to Pattis for review and completion of certain information needed to file (1.1); Emails regarding interim fees to be paid (.4).	1.90

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10/18/2023	V. Driver	B190/	Review lengthy email from UCC seeking additional information and send to BBA regarding gathering information on same (.7); respond to same (.2); emails with co-counsel on timing of rulings (.2).	1.10
10/18/2023	V. Driver	B210/	Approve withdrawal of admin claim.	0.30
10/18/2023	D. Harlan	B160/	Finalize edits on Pattis employment application.	0.60
10/18/2023	D. Harlan	B190/	Perform document review.	11.30
10/18/2023	C. Stephenson	B110/	Prepare for all hands meeting (1.1); prepare claims analysis and plan information (1.8).	2.90
10/18/2023	E. Weaver	B110/	Electronic case file management.	0.50
10/18/2023	E. Weaver	B160/	Draft, finalize and file motion for withdrawal of allowance and payment of administrative expenses pursuant to 503(B)(1) in the FSS case.	1.20
10/18/2023	J. Yoon	B160/	Analyze and review local and judge-specific rules regarding fee applications in preparation to draft the same (0.6); analyze and review docket entries regarding debtor's professionals and status of fee statements and interim applications (1.4); draft and revise consolidated fee statements for debtor (.9).	2.90

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10/19/2023	J. Davis	B190/	Receipt and review opinions/orders in adversary proceedings (1.3); brief discussions with trial team (.2).	1.50
10/19/2023	V. Driver	B110/	Call to review and analyze issue with pro fee disclosures on MOR.	0.50
10/19/2023	V. Driver	B190/	Initial review of MSJ rulings (1.1); calls to discuss rulings with client (1.3); discuss rulings with trial team and potential next steps (1.1); review and respond to bank statement issues with UCC counsel (.2).	3.70
10/19/2023	V. Driver	B230/	Call with potential purchaser and Sub V trustee and FSS.	0.80
10/19/2023	V. Driver	B320/	Plan strategy session to discuss individual plan research issues, structure, claims classification and various other issues (3.6); work on proposed calendar for confirmation (1.1).	4.70
10/19/2023	D. Harlan	B120/	Attend exit strategy meeting.	3.10
10/19/2023	D. Harlan	B190/	Perform document review.	5.40
10/19/2023	D. Harlan	B320/	Research and analyze case law regarding Debtor's estate.	1.90
10/19/2023	D. McClellan	B190/	Conference regarding court's orders on dischargeability.	0.40

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10/19/2023	D. McClellan	B190/	Review and analyze court's Texas and Connecticut orders on dischargeability.	3.90
10/19/2023	C. Stephenson	B190/	Review opinions for dischargeability and analyze same (6.3); conference and correspondence regarding same (1.8).	8.10
10/19/2023	E. Weaver	B190/	Review memorandum decisions for both adversary cases and circulate to team.	0.30
10/19/2023	R. Yates	B190/	Review summary judgment order in Connecticut (1.0); analyze the same with Chris Davis and Deric J. McClellan (.6).	1.60
10/19/2023	J. Yoon	B190/	Analyze and review case law, statutes, and rules of federal procedures and bankruptcy procedures regarding appeal of adversary proceedings.	2.30
10/19/2023	J. Yoon	B320/	Analyze and review issues regarding plan confirmation and strategize regarding the same.	3.20
10/20/2023	J. Davis	B190/	Call with AJ personal counsel Shelby to review the Court's recent rulings and discuss issues for appeal.	1.00
10/20/2023	V. Driver	B160/	Review and analyze application to expand role of N. Pattis for subpoena work (.7); Call with N. Pattis regarding expanded role emergency resolution due to subpoena being withdrawn (.4).	1.10

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10/20/2023	V. Driver	B190/	Review and analyze interlocutory appeal issues and actions post-MSJ ruling (1.8); calls with client discussing MSJ ruling and plan of action following same (1.6); detailed review of MSJ rulings and exploring appellate options (1.7).	5.10
10/20/2023	V. Driver	B210/	Review and response to correspondence with FSS counsel regarding video game and book sale split terms and calls with BBA and client regarding same.	0.70
10/20/2023	D. Harlan	B160/	Draft edits to Pattis application.	0.90
10/20/2023	D. Harlan	B160/	Draft motion to expedite.	1.60
10/20/2023	D. Harlan	B190/	Draft email re appeals issue	0.30
10/20/2023	D. Harlan	B190/	Perform document review.	7.40
10/20/2023	C. Stephenson	B190/	Team call and emails regarding appeal issues.	2.30
10/20/2023	E. Weaver	B160/	Review spreadsheet received from BlackBriar Advisors and draft, finalize and file September monthly fee statement.	2.20
10/20/2023	R. Yates	B190/	Review summary judgment order in Texas litigation.	0.60

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10/20/2023	R. Yates	B190/	Analyze arguments in order on summary judgment (1.0); develop legal strategy regarding the same (.9).	1.90
10/20/2023	R. Yates	B190/	Prepare for and attend meeting with Shelby Jordan	1.00
10/20/2023	J. Yoon	B190/	Email analysis regarding adversary proceeding appeal process	3.10
10/20/2023	J. Yoon	B240/	Exchange emails with Travis County Attorneys' Office regarding tax status	0.30
10/21/2023	V. Driver	B190/	Emails confirming deposition rescheduling.	0.20
10/21/2023	D. Harlan	B190/	Perform document review.	3.70
10/22/2023	V. Driver	B320/	Work on legal budget projections for plan projections.	0.60
10/22/2023	D. Harlan	B190/	Perform document review.	6.80
10/22/2023	C. Stephenson	B110/	Draft Work budget for all case matters.	3.20
10/23/2023	L. Dauphin	B190/	Search, identify and redact personal information related to minor children.	0.60
10/23/2023	V. Driver	B110/	Call with co-counsel to discuss case status and strategy.	0.70
10/23/2023	V. Driver	B190/	Meetings with client to discuss strategy with settlement and related issues (1.4); attend to discovery issues (.3).	1.70
10/23/2023	V. Driver	B195/	Travel to Austin (billed at half time 3.6)	1.80

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10/23/2023	V. Driver	B320/	Meeting with client to discuss plan structures possible for individuals in Chapter 11 (1.2); review case law on individual 11's and develop plan strategies (2.3)	3.50
10/23/2023	V. Driver	B320/	Emails with professional seeking budgets for financial projections (.3); review and analyze financial projections (.8).	1.10
10/23/2023	D. Harlan	B110/	Attend client meeting.	0.80
10/23/2023	D. Harlan	B110/	Research property of the estate issues.	1.10
10/23/2023	D. Harlan	B190/	Perform document review.	1.30
10/23/2023	D. Harlan	B195/	Travel to Austin, Texas (3.5). [Billed at half time]	1.70
10/23/2023	D. McClellan	B190/	Review and analyze rules of bankruptcy procedure and cases interpreting them to determine best route for interlocutory appeal of dischargeability orders	6.60
10/23/2023	C. Stephenson	B110/	Draft and revise budget (2.2); review and respond to related correspondence (1.1).	3.30
10/23/2023	C. Stephenson	B160/	Revise billing statement (1.4); draft related correspondence (.4).	1.80
10/23/2023	C. Stephenson	B320/	Perform analysis and draft correspondence regarding plan of reorganization.	3.80

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10/23/2023	E. Weaver	B110/	Prepare draft of third amended schedules (3.8); email correspondence to BlackBriar Advisors listing changes (.3).	4.10
10/23/2023	R. Yates	B190/	Formulate strategy for interlocutory appeal of summary judgment orders	0.50
10/23/2023	J. Yoon	B190/	Analyze and review issues regarding appeal in preparation to draft notices of appeal and motion for leave to appeal Texas and Connecticut interlocutory orders	2.50
10/23/2023	J. Yoon	B240/	Call with Travis County Appraisal District regarding potential tax issues	0.60
10/24/2023	V. Driver	B110/	Meetings with client on status of case (2.1); call with co – counsel on status of case and overall case strategy (.9)	3.00
10/24/2023	V. Driver	B130/	Call with potential purchaser of property,	0.80
10/24/2023	V. Driver	B190/	Work on discovery issues with document production and privilege log.	1.90
10/24/2023	V. Driver	B195/	Travel from Austin billed at half time of 3.6 (1.8)	1.80
10/24/2023	D. Harlan	B110/	Attend client meeting.	1.40
10/24/2023	D. Harlan	B130/	Draft final edits on personal property motion and order.	0.60
10/24/2023	D. Harlan	B150/	Draft correspondence to UCC.	0.80

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10/24/2023	D. Harlan	B160/	Work on real estate broker project.	0.90
10/24/2023	D. Harlan	B190/	Perform document review.	5.30
10/24/2023	D. McClellan	B190/	Review and analyze statutes and case for possible interlocutory appeal.	4.50
10/24/2023	D. McClellan	B190/	Develop strategy regarding potential appeal.	0.90
10/24/2023	C. Stephenson	B190/	Team call regarding dischargeability appellate issues.	1.30
10/24/2023	E. Weaver	B190/	Review the UCC's second rescheduled 2004 examination of R. Schleizer and docket same.	0.20
10/24/2023	R. Yates	B190/	Review summary judgment order in Connecticut case to identify "questions presented" for appellate purposes.	1.70
10/24/2023	R. Yates	B190/	Draft preliminary statement and factual background for motion for leave to appeal summary judgment order.	1.30
10/24/2023	R. Yates	B190/	Conduct legal research on bankruptcy appellate procedure for appeal of interlocutory order	0.70
10/24/2023	R. Yates	B190/	Create outline for motion for leave to appeal summary judgment order on dischargeability	0.50

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10/24/2023	R. Yates	B190/	Analyze options for interlocutory appeal of summary judgment order (.3); conduct legal research on the same (.8).	1.10
10/24/2023	J. Yoon	B160/	Draft and revise fee statements for debtor's professionals.	0.70
10/24/2023	J. Yoon	B190/	Analyze and review appeal issues and procedures for interlocutory appeals in adversary proceedings (0.9); strategize appeal of Connecticut and Texas adversary proceedings (0.8); analyze and review case law and statutes regarding motion for leave to appeal interlocutory order (3.8)	4.50
10/25/2023	V. Driver	B160/	Review and analyze emails on fee statements.	0.70
10/25/2023	V. Driver	B190/	Lengthy emails and calls regarding settlement discussions and meeting logistics and preconditions to same with UCC (1.1); call with Sub V Trustee counsel re same (.5).	1.60
10/25/2023	V. Driver	B195/	Travel from Austin home (billed at half time 3.0).	1.50
10/25/2023	D. Harlan	B190/	Reclassify documents marked privileged for privilege log.	2.30
10/25/2023	D. Harlan	B195/	Travel back to Dallas from Austin (3.5). [Billed at half time]	1.70
10/25/2023	J. Jones	B190/	Research authority in the Fifth Circuit for interlocutory appeals.	3.20

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10/25/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders	7.80
10/25/2023	C. Stephenson	B320/	Draft and revise Plan of Reorganization.	4.30
10/25/2023	E. Weaver	B160/	Review all invoices The Reynal Firm and Chris Martin Firm from the employment their date forward and prepare a spreadsheet of hours by timekeeper and calculate amounts by 50% to be shared with FSS.	4.20
10/25/2023	R. Yates	B190/	Conduct legal research on standards for leave to file interlocutory appeal from bankruptcy court to district court.	1.40
10/25/2023	J. Yoon	B160/	Analyze and review invoices of professionals Martin, Disiere, Jefferson & Wisdom LLP and The Reynal Law Firm, PC.	0.30
10/25/2023	J. Yoon	B190/	Analyze and review case law and statutes regarding motion for leave to appeal interlocutory order (1.1); analyze and review local rules and judge-specific rules in preparation to draft motion for leave to appeal interlocutory order (0.4)	1.50

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10/26/2023	J. Davis	B190/	Telephone call from Ray Battaglia who represents Free Speech Systems to discuss the recent rulings on summary judgment in the Connecticut and Texas adversary proceeding cases; discussion of next steps.	0.50
10/26/2023	V. Driver	B190/	Calls and emails discussing strategy on settlement meeting, venue, dates, and terms (2.4); analyze outstanding issues in discovery (.4).	2.80
10/26/2023	V. Driver	B230/	Analyze issues with listing rental property.	0.40
10/26/2023	D. Harlan	B190/	Review documents marked privileged for privilege log.	9.00
10/26/2023	J. Jones	B190/	Research authority in the Fifth Circuit for interlocutory appeals, specifically as they relate to bankruptcy for motion that Deric J. McClellan is filing.	2.50
10/26/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	6.50
10/26/2023	C. Stephenson	B150/	Calls and correspondence regarding creditor communications.	1.80
10/26/2023	C. Stephenson	B160/	Review and revise September billing statement.	2.80
10/26/2023	C. Stephenson	B170/	Review and analyze correspondence regarding issues with billing.	1.40

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10/26/2023	E. Weaver	B160/	Draft first monthly fee statement for the Chris Martin Firm and The Reynal Firm.	4.80
10/26/2023	R. Yates	B190/	Review and assess arguments for appeal on summary judgment order.	2.70
10/26/2023	R. Yates	B190/	Draft necessarily decided section of motion for leave to appeal order on summary judgment relating to IIED and defamation default judgments.	2.70
10/26/2023	R. Yates	B190/	Cite check cases that summary judgment order relied upon.	0.40
10/26/2023	R. Yates	B190/	Draft arguments for substantial ground for difference of opinion necessary for leave of court to appeal interlocutory order.	0.60
10/26/2023	R. Yates	B190/	Review and assess CUTPA ruling and arguments on summary judgment order.	0.80
10/26/2023	R. Yates	B190/	Draft balancing test portion of motion for leave to file appeal of summary judgment order.	0.50
10/27/2023	V. Driver	B190/	Emails and calls moving R. Schleizer deposition (.8); emails and calls discussing issues with settlement terms and related issues (2.6); calls with client regarding same (.8); calls with R. Schleizer on same (.9).	5.10
10/27/2023	D. Harlan	B190/	Perform document review.	9.50

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10/27/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	5.20
10/27/2023	E. Weaver	B160/	Work on and finalize draft of first monthly fee statement of the Chris Martin Firm and the Reynal Firm.	5.20
10/27/2023	R. Yates	B190/	Revise substantial disagreement portion of motion for leave to file appeal of order on summary judgment.	0.80
10/27/2023	R. Yates	B190/	Conduct legal research on controlling question of law for motion for leave to file appeal of interlocutory summary judgment order.	0.60
10/27/2023	R. Yates	B190/	Draft section on controlling question of law for motion for leave to appeal interlocutory summary judgment order.	0.90
10/27/2023	R. Yates	B190/	Draft argument on "actually litigated" prong for motion for leave to appeal interlocutory summary judgment order.	0.80
10/27/2023	R. Yates	B190/	Formulate strategy for consistency of argument across motions for leave to appeal between Connecticut and Texas drafts.	0.50
10/27/2023	R. Yates	B190/	Draft factual background section for motion for leave to appeal interlocutory summary judgment order.	1.20

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10/27/2023	J. Yoon	B190/	Analyze and review issues and strategies for background facts and procedural history in preparation to draft motion for leave to appeal an order on Connecticut Plaintiffs' motion for summary judgment (0.3); draft and revise the same (4.2).	4.50
10/28/2023	V. Driver	B110/	Call with client on status of case and related issues.	0.80
10/28/2023	D. Harlan	B190/	Perform document review.	3.80
10/28/2023	J. Yoon	B190/	Draft and revise motion for leave to appeal Connecticut interlocutory order.	4.30
10/29/2023	D. Harlan	B190/	Perform document review.	2.50
10/29/2023	D. McClellan	B190/	Draft motions for leave to file interlocutory appeal of Texas and Connecticut dischargeability orders.	7.50
10/30/2023	V. Driver	B190/	Draft initial settlement points for discussion and subsequent emails with recipients thereafter.	3.10
10/30/2023	D. Harlan	B190/	Perform document review.	6.70
10/30/2023	J. Jones	B190/	Research cases from the Fifth Circuit and from the District Court from the Southern District of Texas.	5.50

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10/30/2023	D. McClellan	B190/	Draft Connecticut motion for leave to file interlocutory appeal of Connecticut dischargeability order.	13.10
10/30/2023	C. Stephenson	B160/	Review and revise billing statement (3.8); review and respond to related correspondence (1.1).	4.90
10/30/2023	C. Stephenson	B190/	Review and respond to multiple correspondence and calls regarding settlement terms.	2.70
10/30/2023	E. Weaver	B160/	Draft eighth monthly fee statement of BlackBriar Advisors.	1.80
10/30/2023	E. Weaver	B310/	Continue reviewing claims register and downloading claims.	1.00
10/30/2023	R. Yates	B190/	Formulate strategy for addressing the argument that leave to file an appeal would materially advance the litigation.	0.80
10/30/2023	R. Yates	B190/	Edit and add details to factual background section of motion for leave to file appeal of interlocutory summary judgment order.	1.20
10/30/2023	R. Yates	B190/	Review memo on precedential legal standards for leave to appeal interlocutory order.	0.20
10/30/2023	R. Yates	B190/	Coordinate revisions of drafts for both Connecticut and Texas case briefs on motion for leave to appeal.	0.50

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10/30/2023	J. Yoon	B190/	Analyze and review issues regarding procedural posture and factual background in the motion for leave to appeal interlocutory Connecticut order.	0.40
10/31/2023	J. Davis	B190/	Review and edit Motion for Leave to Appeal.	2.50
10/31/2023	V. Driver	B190/	Call with Texas trial team on appellate status and budgeting (.6); emails regarding same (.2); call with client regarding issues with Texas budgeting and trial (.4).	1.20
10/31/2023	V. Driver	B190/	Call with Texas trial team on appellate status and budgeting (.6); emails regarding same (.2); call with client regarding issues with Texas budgeting and trial (.4).	1.20
10/31/2023	V. Driver	B240/	Emails and calls to P. Story on IRS claim and refund status (.7); emails with UCC sending tax filings and regarding additional tax requests (.4).	1.10
10/31/2023	V. Driver	B320/	Calls and emails with counsel for UCC and plaintiffs to discuss plan settlement issues, meeting scheduling, and strategy.	2.10
10/31/2023	D. Harlan	B190/	Perform document review.	10.50

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Responsible Attorney

Vickie L. Driver

Post - petition

10/31/2023	D. McClellan	B190/	Draft motion for leave to file interlocutory appeal of Connecticut dischargeability order.	7.00
10/31/2023	D. McClellan	B190/	Draft motion for leave to file interlocutory appeal of Texas dischargeability order.	9.50
10/31/2023	C. Stephenson	B190/	Review and revise CT Motion for Leave to Appeal Interlocutory Order (5.7); draft related correspondence regarding appeal (1.2).	6.90
10/31/2023	R. Yates	B190/	Review edits to motion for leave to file appeal.	1.50
10/31/2023	J. Yoon	B190/	Draft and revise motion for leave to appeal Connecticut interlocutory order.	6.70
11/01/2023	J. Davis	B190/	Work with appellate team on the Motion for Leave for Interlocutory Appeal for the Connecticut Plaintiffs case, drafting and revising final draft.	1.20
11/01/2023	V. Driver	B190/	Preparation for and attend meeting with creditors to discuss resolution of various matters.	3.20
11/01/2023	V. Driver	B195/	Travel to and from Houston for meeting (6.0). [billed at half time]	3.00
11/01/2023	D. Harlan	B190/	Perform document review.	9.50

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Responsible Attorney

Vickie L. Driver

Post - petition

11/01/2023	J. Jones	B190/	Create citation for brief in support of cited to authority for motion for Deric J. McClellan.	0.30
11/01/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Connecticut dischargeability order.	3.50
11/01/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Texas dischargeability order.	4.10
11/01/2023	D. McClellan	B190/	Develop strategy regarding Texas and Connecticut motions for leave to file interlocutory appeal of Connecticut dischargeability order.	0.50
11/01/2023	C. Stephenson	B190/	Review Notices of Appeal (.5); draft related correspondence (.9); review and revise Motions for Leave to Appeal Interlocutory Orders (7.8).	9.20
11/01/2023	E. Weaver	B190/	Locate court reporting firm that transcribed hearing transcript for 08-15-2023 hearing in both adversary cases (.1); communications with court reporting firm regarding same (.1); review and circulate transcript to team (.2).	0.40
11/01/2023	R. Yates	B190/	Respond to inquiry regarding scope of arguments in motion for leave to appeal.	0.80
11/01/2023	R. Yates	B190/	Review and edit Texas motion for leave to appeal.	1.10

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Responsible Attorney

Vickie L. Driver

Post - petition

11/01/2023	R. Yates	B190/	Conduct legal research on requirements for notice of appeal to accompany motion for leave.	0.20
11/01/2023	R. Yates	B190/	Coordinate review of motion for leave to file appeal.	0.40
11/01/2023	R. Yates	B190/	Review edits and draft updated Question Presented.	1.60
11/01/2023	J. Yoon	B190/	Draft and revise motions for leave to appeal Connecticut and Texas interlocutory orders (7.8); draft and revise notices of appeal for both the Texas and Connecticut orders (2.9).	10.70
11/02/2023	J. Davis	B190/	Review and revise Motion for Leave to File Interlocutory Appeal related to the Texas plaintiffs' adversary proceeding and Judge Lopez's ruling.	2.60
11/02/2023	V. Driver	B110/	Emails with court rescheduling hearings.	2.00
11/02/2023	V. Driver	B190/	Calls with various claimants on issues regarding settlement (1.5); prepare for discussions with creditors (.8).	2.30
11/02/2023	D. Harlan	B190/	Reclassifying documents marked privileged.	0.80
11/02/2023	J. Jones	B190/	Proofread and revise motion for leave to appeal for Deric J. McClellan.	0.90
11/02/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Connecticut dischargeability order.	6.90

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Vickie L. Driver

Post - petition

11/02/2023	D. McClellan	B190/	Draft and revise motion for leave to file interlocutory appeal of Texas dischargeability order.	4.20
11/02/2023	T. Rinck	B110/	Analyze draft Debtor Alexander Jones' Motion for Leave to Appeal Interlocutory Order.	0.40
11/02/2023	T. Rinck	B190/	Revise Motion for Leave to Appeal Interlocutory Order.	1.80
11/02/2023	T. Rinck	B190/	Draft and develop TOC and TOA for Debtor Alexander Jones' Motion for Leave to Appeal Interlocutory Order.	2.10
11/02/2023	T. Rinck	B190/	Draft and develop TOC and TOA to Motion for Leave to Appeal Order on Connecticut Plaintiffs' Motion for Summary Judgment.	3.20
11/02/2023	C. Stephenson	B190/	Review and revise Notices of Appeal (2.6); draft and review related correspondence (1.8); review and revise Motions for Leave to Appeal (4.4).	8.80
11/02/2023	E. Weaver	B160/	Email communications with Rachel Kennerly regarding fourth monthly fee statement.	0.20
11/02/2023	E. Weaver	B185/	Email communications with court coordinator regarding hearing date for the motion to assume or reject executory contracts.	0.20
11/02/2023	E. Weaver	B190/	Review case docket to determine notice parties (.3); finalize and file notice of appeal and motion for leave to appeal interlocutory order for Texas and Connecticut (2.0); e-serve notice parties (.4).	2.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/02/2023	R. Yates	B190/	Coordinate with litigation team regarding final edits and preparations for filing.	0.50
11/02/2023	J. Yoon	B190/	Revise and finalize the motion for leave to appeal Texas interlocutory order (9.6); revise and finalize notices of appeal for both Connecticut and Texas adversary proceedings (1.7).	11.30
11/03/2023	J. Davis	B190/	Conference regarding settlement issues.	0.50
11/03/2023	V. Driver	B110/	Calls with client discussing case and strategy regarding same.	1.70
11/03/2023	V. Driver	B190/	Emails and calls with trial team sending appellate brief for review and comment (.8); call with All plaintiff counsel regarding setting up New York meeting terms. (.9)	1.70
11/03/2023	D. Harlan	B190/	Draft privilege log.	4.00
11/03/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	1.90
11/03/2023	C. Stephenson	B190/	Review and revise Motions for Leave to Appeal (7.3); draft and review related correspondence (3.2).	10.50
11/03/2023	R. Yates	B190/	Review and revise documents and potential filings associated with Texas case regarding options for resolution.	2.20
11/04/2023	D. Harlan	B190/	Draft privilege log.	1.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/04/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	0.70
11/04/2023	R. Yates	B190/	Review arguments and documents in support of resolution of Texas case.	1.60
11/05/2023	D. McClellan	B190/	Review and revise potential filing related to Texas case.	2.00
11/06/2023	J. Davis	B190/	Communications with client regarding appellate strategy matters.	1.50
11/06/2023	V. Driver	B190/	Introduce trial teams for input on appellate brief (.2); call with client regarding input from trial team (.4).	0.60
11/06/2023	V. Driver	B210/	Review and analyze FSS projections, changes from prior versions (1.1); calls with FA on issues with projections (.5); calls with client regarding same (.9); emails and calls with FSS and Sub V trustee counsel on projection issues (1.1).	3.80
11/06/2023	V. Driver	B240/	Emails with A. Cooksey on tax audit and outstanding information to be provided (.3); gather information on property tax payments made and position of owner of real estate on repayment (.5).	0.80
11/06/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	3.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/06/2023	D. Harlan	B320/	Research potential plan issues.	0.90
11/06/2023	E. Weaver	B160/	Review UCC's May, 2023 fee and expense summary and circulate to team.	0.10
11/06/2023	E. Weaver	B190/	Review UCCs third rescheduled 2004 examination of R. Schleizer and docket same.	0.10
11/06/2023	E. Weaver	B190/	Review UCC's 2004 Requests to Swan Bitcoin and docket deadline for same.	0.10
11/06/2023	R. Yates	B190/	Conference regarding issues related appeal.	0.50
11/07/2023	V. Driver	B190/	Preparation for settlement meeting.	1.20
11/07/2023	V. Driver	B195/	Travel to New York for settlement meeting (5.6 – billed at half time).	2.80
11/07/2023	V. Driver	B210/	Review and analyze plans confirmed by CRO and discuss issues with former plan agent (1.4); messages and calls with client on issues with operations (1.3); calls and emails on FSS projections and plan (.8).	3.40
11/07/2023	D. Harlan	B320/	Research and analyze potential plan issues.	8.50
11/07/2023	C. Stephenson	B110/	Review and respond to correspondence regarding case strategy matters.	2.30
11/07/2023	E. Weaver	B190/	Email communications and telephone call with court coordinator regarding appeal.	0.20

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Responsible Attorney

Vickie L. Driver

Post - petition

11/07/2023	E. Weaver	B190/	Procure information related to trust agreement summaries and circulate to team and BlackBriar Advisors.	0.80
11/07/2023	R. Yates	B190/	Review and summarize constitutional arguments for use in potential resolution.	1.10
11/08/2023	V. Driver	B190/	Meeting to discuss strategy for larger meeting (2.5); meeting with Committee and Plaintiffs lawyers (3.1); discuss meeting and results. (1.3)	6.90
11/08/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	1.50
11/08/2023	D. Harlan	B190/	Prepare deposition documents for R. Schleizer.	3.30
11/08/2023	D. Harlan	B190/	Attend settlement meeting.	2.80
11/08/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	1.60
11/08/2023	E. Weaver	B110/	Electronic case file management.	1.50
11/09/2023	J. Booth	B120/	Conference regarding trust summaries.	0.10
11/09/2023	V. Driver	B195/	Travel from New York for settlement meeting. (5.6 – billed at half time)	2.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/09/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	3.80
11/09/2023	C. McDonald	B190/	Email correspondence regarding Alex Jones' trust summaries.	0.10
11/09/2023	C. Stephenson	B110/	Respond to UST request for information.	0.30
11/09/2023	C. Stephenson	B190/	Review appellate notifications and draft related correspondence.	0.80
11/09/2023	E. Weaver	B110/	Review and organize bank statements received to date (.8); email correspondence to Kathy Norderhaug regarding all bank statements requested by trustee's office (.2).	1.00
11/09/2023	E. Weaver	B110/	Compile related documents for meeting with BlackBriar Advisors on 11-10-2023.	0.80
11/09/2023	E. Weaver	B185/	Draft notice of hearing for 11-27-2023 hearing.	0.40
11/09/2023	J. Yoon	B190/	Analyze and review federal rules of bankruptcy procedure, case law, statutes regarding prerequisites to perfecting an interlocutory appeal.	1.30
11/10/2023	V. Driver	B110/	Review and revising schedules and global notes regarding same.	1.30
11/10/2023	V. Driver	B140/	Email and call Dallas IRS contact seeking information on P. Story.	0.30

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Responsible Attorney

Vickie L. Driver

Post - petition

11/10/2023	V. Driver	B160/	Calls with client on status of attorney bills and forecasting (.8); emails to Texas trial team seeking budget and max billing now that appeal is filed (.2); draft Attorney fee budget and forecast to client (.4); draft emails to allow Reynal firm to apply retainer (.1).	1.50
11/10/2023	V. Driver	B190/	Preparation for R. Schleizer deposition (1.8); review Texas case law on transferring real property and effectiveness of writing and recordation. (.3)	2.10
11/10/2023	D. Harlan	B190/	Research and analyze deed conveyance law in Texas.	0.30
11/10/2023	D. Harlan	B190/	Privilege review of client documents to properly identify and mark as privileged in order to prepare corresponding privilege log.	1.50
11/10/2023	C. McDonald	B190/	Email correspondence regarding AJ trusts.	0.20
11/10/2023	C. Ottaway	B190/	Correspondence regarding trust issues.	0.30
11/10/2023	C. Stephenson	B110/	Perform research and analysis regarding schedule amendments.	1.80
11/10/2023	C. Stephenson	B190/	Analyze UCC correspondence and draft related summary correspondence.	1.60
11/10/2023	E. Weaver	B110/	Revisions to third amended schedules and circulate to team for review.	1.00

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Vickie L. Driver

Post - petition

11/10/2023	E. Weaver	B185/	Finalize and file notice of hearing for 11-27-2023 hearing and docket same.	0.30
11/10/2023	E. Weaver	B185/	Finalize and file amended notice of hearing for 11-27-2023 hearing and docket same.	0.30
11/12/2023	V. Driver	B190/	Initial review of settlement offer and calls with L. Freeman on same.	1.20
11/12/2023	D. Harlan	B210/	Research concerns regarding potential plan and acceptable levels of capex, opex, and net disposable income.	1.60
11/12/2023	R. Yates	B190/	Conduct legal research on the Tenth Circuit approach to "willful and malicious injury" under Section 523(a)(6).	0.70
11/13/2023	J. Booth	B210/	Communications regarding disability language in the employment agreement.	0.30
11/13/2023	C. Chamberlain	B210/	Correspondence regarding disability provision for settlement terms.	0.10
11/13/2023	V. Driver	B110/	Review and amend schedules, SOFA and Global Notes.	0.90
11/13/2023	V. Driver	B130/	Call with S. Brauner on personal property sale motion and order (.2); revise both and prepare for filing. (.4)	0.60
11/13/2023	V. Driver	B160/	Confirming monthly fee statement filing status.	0.90

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Responsible Attorney

Vickie L. Driver

Post - petition

11/13/2023	V. Driver	B190/	Calls with various parties discussing settlement proposal from plaintiffs (2.1); review in detail and revise settlement offer with initial thoughts (1.1); call with client explaining offer and intention in response (.8).	4.00
11/13/2023	V. Driver	B190/	Emails and calls moving deposition for R. Schleizer and discussing settlement issues.	0.80
11/13/2023	V. Driver	B240/	Calls with A. Jenkins seeking information on who to call in Houston regarding refund and claim made.	0.30
11/13/2023	D. Harlan	B120/	Call regarding trusts in preparation for R. Schleizer's deposition.	0.50
11/13/2023	D. Harlan	B320/	Research and analyze potential plan confirmation issues related to maximum net disposable income and capital/operating expenditures.	4.60
11/13/2023	D. Harlan	B320/	Research and analyze case law authorities governing plan confirmation time period.	2.10
11/13/2023	C. McDonald	B190/	Prepare for call and call regarding Alex Jones' trusts.	1.40
11/13/2023	C. Ottaway	B190/	Review various trusts (.5); conference regarding same (.8).	1.30
11/13/2023	C. Stephenson	B120/	Call regarding trust ownership and issues.	0.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/13/2023	C. Stephenson	B190/	Review and analyze settlement offer and related correspondence.	1.30
11/13/2023	C. Stephenson	B320/	Perform and analyze research regarding plan issues (2.2); draft plan and disclosure statement (2.8).	5.00
11/13/2023	E. Weaver	B110/	Compile October bank statements and circulate to the trustee's office.	0.80
11/13/2023	E. Weaver	B160/	Draft ninth monthly fee statement for Crowe & Dunlevy.	1.20
11/13/2023	E. Weaver	B160/	Review spreadsheet received from BlackBriar Advisors and draft eighth monthly fee statement.	1.40
11/13/2023	J. Yoon	B160/	Analyze and review professional Pattis & Smith, LLC's employment application regarding fees and costs of the scope of employment.	0.40
11/14/2023	V. Driver	B130/	Prepare motion to sell personal property for filing (.4); emails with UCC regarding same (.1).	0.50

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Responsible Attorney

Vickie L. Driver

Post - petition

11/14/2023	V. Driver	B190/	Meeting with client to discuss counter proposal terms and discuss strategy on case outcomes under settlement and other scenarios (2.6); analyze and strategize regarding counter proposal terms (2.8); attempt to schedule meeting with FSS to discuss counter proposal terms (.6); emails with Texas counsel on trial continuance (.2).	6.20
11/14/2023	V. Driver	B195/	Travel to Austin for settlement meeting (6.0 – billed at half time).	3.00
11/14/2023	V. Driver	B320/	Analyze and strategize plan terms on multiple tracks.	1.60
11/14/2023	D. Harlan	B320/	Research and analyze various plan issues.	7.10
11/14/2023	C. Stephenson	B160/	Review and revise fee statement for Blackbriar Advisors and draft related correspondence.	0.70
11/14/2023	C. Stephenson	B190/	Review and revise potential counter-offer/term sheet (1.8); draft multiple related correspondence (1.4).	3.20
11/14/2023	C. Stephenson	B320/	Perform and analyze plan related research and draft related correspondence.	2.80
11/14/2023	E. Weaver	B160/	Finalize, file and e-serve ninth monthly fee statement for Crowe & Dunlevy.	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/14/2023	J. Yoon	B320/	Analyze and review statutes and case law regarding issues and strategies in preparation for drafting plan.	3.50
11/15/2023	C. Campbell	B110/	Review and respond to emails regarding employment agreement.	0.10
11/15/2023	V. Driver	B110/	Send email from UST to BBA to assemble bank account statements.	0.10
11/15/2023	V. Driver	B210/	Correspondence with client regarding media industry decline and send article on same to FSS counsel.	0.40
11/15/2023	D. Harlan	B190/	Perform document review.	2.70
11/15/2023	D. Harlan	B320/	Research and analyze case law authorities governing plan confirmation time period.	2.30
11/15/2023	D. Harlan	B320/	Research and analyze governing case law authorities in Texas, and elsewhere, on plan obligations.	3.90
11/15/2023	C. Stephenson	B110/	Review and respond to multiple correspondence regarding schedule amendments (2.1); draft correspondence to UCC regarding same (.1); review and respond to UST requests (.5).	2.70
11/15/2023	E. Weaver	B160/	Finalize, file and e-serve eighth monthly fee statement for BlackBriar Advisors.	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/15/2023	J. Yoon	B320/	Analyze and review statutes and case law regarding issues and strategies in preparation for drafting plan.	7.50
11/16/2023	D. Harlan	B320/	Research, analyze, and take notes on governing case law for preparation of plan.	6.90
11/16/2023	D. McClellan	B190/	Review and analyze response brief in opposition to motion for interlocutory appeal of Texas order.	1.10
11/16/2023	C. Stephenson	B110/	Draft and review correspondence with UCC regarding schedule amendments (.3); correspondence and conferences regarding schedule amendments and client approval of same (.8).	1.10
11/16/2023	E. Weaver	B110/	Revise schedules A/B, C & G and Statement of Financial Affairs and circulate to BlackBriar Advisors for review (2.0); email correspondence to BlackBriar regarding revisions (.3).	2.30
11/16/2023	J. Yoon	B190/	Analyze and review local and judge-specific rules in anticipation of a reply brief to the responses in opposition to the motion for leave to appeal interlocutory orders.	0.30
11/17/2023	V. Driver	B190/	Call with Sub V Trustee on status of settlement (.4); emails on extension on appeals (.2); emails on settlement offer (.1).	0.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/17/2023	D. Harlan	B190/	Conducting privilege review of final client documents to properly identify and mark as privileged said documents in order to prepare corresponding privilege log.	4.50
11/17/2023	D. Harlan	B320/	Research and analyze governing case law regarding various plan issues.	4.80
11/17/2023	C. Stephenson	B110/	Draft and review correspondence regarding amended schedules.	1.30
11/17/2023	C. Stephenson	B320/	Review and analyze amended FSS Plan (1.2); conferences regarding plan research matters (1.1).	2.30
11/17/2023	R. Yates	B190/	Formulate and discuss strategy for reply brief.	0.60
11/17/2023	J. Yoon	B190/	Analyze issues regarding responses and strategize reply brief (0.2); draft email and proposed agreed order extending reply briefing deadline (4).	4.20
11/18/2023	V. Driver	B190/	Review and finalize settlement offer and send to counsel.	0.80
11/18/2023	D. Harlan	B190/	Conduct privilege review of final client documents to properly identify and mark as privileged said documents in order to prepare corresponding privilege log.	5.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/19/2023	D. Harlan	B320/	Research governing case law authorities for disposable income in plans for high net worth individuals in preparation for plan submission.	6.00
11/19/2023	J. Yoon	B320/	Analyze and review issues in preparation to draft plan and strategy for plan confirmation.	9.10
11/20/2023	V. Driver	B110/	Analyzing changes to schedules.	1.10
11/20/2023	V. Driver	B160/	Review and approve real estate broker contract for ranch.	0.40
11/20/2023	V. Driver	B190/	Preparation for and attend call with UCC, Texas and CT plaintiffs, FSS, and PQPR to discuss settlement and related issues (.8); calls subsequent to call regarding responses to UCC and Plaintiff intent to break standstill on plan filing (1.4); call with Texas counsel on appeal extension request and email Trial counsel on same (.4); draft email seeking briefing extension on appeals (.3).	2.90
11/20/2023	V. Driver	B210/	Calls with client on IT manager leaving FSS (.5); emails with FSS and Sub V counsel on plans to replace IT manager (.1); call with FSS counsel on IT manager departure (.3).	0.90

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Vickie L. Driver

Post - petition

11/20/2023	V. Driver	B320/	Analyze issues with plan drafting, structure, forecasting drafts, and related issues to plan preparation (2.1); call with client to discuss plan filing issues and next steps (.8).	2.90
11/20/2023	D. Harlan	B320/	Attend Plan confirmation call.	0.30
11/20/2023	D. Harlan	B320/	Draft and revise memo regarding Plan related research.	3.60
11/20/2023	D. McClellan	B190/	Review and analyze response brief in opposition to motion for interlocutory appeal of Connecticut and Texas order.	2.20
11/20/2023	C. Stephenson	B320/	Draft Plan of Reorganization (6.3); draft related correspondence (.4).	6.70
11/20/2023	E. Weaver	B170/	Download and review seventh, eighth and ninth monthly fee statements for Teneo Capital, LLC and docket objection deadline for same.	0.40

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Responsible Attorney

Vickie L. Driver

Post - petition

11/20/2023	J. Yoon	B190/	Exchange emails with Connecticut and Texas counsel regarding redline and agreement on proposed agreed orders extending reply briefing deadlines in the motion for leave to appeal interlocutory orders (0.3); revise proposed agreed orders incorporating accepted proposed changes from opposing counsel (0.4); review local rules and judge's procedure regarding extension of briefing deadlines and email the court the proposed agreed orders and regarding the same (0.7).	1.40
11/20/2023	J. Yoon	B190/	Analyze and review pro hac vice procedures in the Southern District of Texas and for Judge Eskridge.	0.20
11/20/2023	J. Yoon	B320/	Analyze and review issues regarding plan and status conference regarding a scheduling order for the plan (0.3); draft and revise request for status conference regarding plan timeline (1.3); draft and revise proposed order granting the same (0.5).	2.10

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Client # 50134

Invoice # 768639

Matter # 00802

Responsible Attorney

Vickie L. Driver

Post - petition

11/21/2023	V. Driver	B190/	Review email from S. Brauner regarding call on settlement and UCC desire to file draft plan and seek scheduling order for Jones to exit BK and discuss same (1.1); call with S. Brauner discussing scheduling for plan confirmation (.7).	1.80
11/21/2023	V. Driver	B210/	Review and discuss objection to cash collateral use for increased salary (.7); review and analyze evidence to support income history for Jones from FSS (.8).	1.50
11/21/2023	V. Driver	B320/	Draft and revising request for status conference and preparing for filing.	1.70
11/21/2023	V. Driver	B320/	Analyze issues relating to plan drafting and progress.	2.20
11/21/2023	D. Harlan	B190/	Perform document review.	1.00
11/21/2023	D. Harlan	B320/	Draft and revise Plan research memo.	1.60
11/21/2023	C. Stephenson	B110/	Review Motion for Status Conference (.8); draft related correspondence (.5).	1.30
11/21/2023	C. Stephenson	B190/	Review Court correspondence and draft related correspondence.	1.30
11/21/2023	C. Stephenson	B320/	Analysis regarding Plan and Disclosure Statement issues.	1.70

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Responsible Attorney

Vickie L. Driver

Post - petition

11/21/2023	E. Weaver	B110/	Review spreadsheet received from BlackBriar Advisors and draft, finalize and file October monthly operating report.	3.00
11/21/2023	E. Weaver	B185/	Draft, finalize and file W&E list for 11-27-2023 hearing.	0.70
11/21/2023	J. Yoon	B190/	Analyze and review deficiency notices for the two interlocutory appeals and call the court clerk's office regarding the same.	0.40
11/22/2023	V. Driver	B110/	Review and analyze amended schedules and sofa and global notes and prepare for filing.	0.90
11/22/2023	V. Driver	B185/	Preparing materials for hearing on motion to reject contract and amended witness and exhibit list.	0.80
11/22/2023	V. Driver	B190/	Correspondence with Texas plaintiffs counsel regarding extension with tax appeal briefing schedules.	0.20
11/22/2023	E. Weaver	B185/	Revise, finalize and file amended W&E for 11-27-2023 hearing (.4); procure exhibits corresponding to list, label and file (.6).	1.00
11/22/2023	E. Weaver	B185/	Compile related pleadings for hearing notebooks and general hearing prep for 11-27-2023 hearing.	3.00

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Responsible Attorney

Vickie L. Driver

Post - petition

11/25/2023	E. Weaver	B110/	Telephone call with R. Schleizer regarding payment transfers (.2); revise third amended schedules, statement of financial affairs and global notes to reflect updates by client and BlackBriar Advisors (1.8).	2.00
11/26/2023	V. Driver	B110/	Review and analyze pleadings in preparation for hearings.	1.80
11/26/2023	V. Driver	B195/	Travel to Houston for hearings and deposition of R. Schleizer (billed at half-time 3.6).	1.80
11/26/2023	D. Harlan	B185/	Draft proffer regarding the contracts in the motion to reject.	0.50
11/26/2023	D. Harlan	B195/	Traveling to Houston from Dallas. (3.5) [Billed at half time]	1.70
11/26/2023	E. Weaver	B110/	Revise, finalize and file schedules, statement of financial affairs and global notes.	1.40
11/27/2023	V. Driver	B110/	Preparation for and attend status conference in case (1.1); follow up with client after hearing to discuss outcome and next steps (.7).	1.80

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Responsible Attorney

Vickie L. Driver

Post - petition

11/27/2023	V. Driver	B185/	Review and analyze motion to reject and responses and objections in preparation for hearing (.9); review and revise proffer for client's testimony in support of motion to reject (.4); review proffer and hearing protocol with client (.8); attend hearing on motion to reject contract (.7).	2.80
11/27/2023	V. Driver	B190/	Meetings with FSS and PQPR counsel discussing settlement potential and related issues.	0.80
11/27/2023	V. Driver	B210/	Preparation for and attend FSS hearing on cash collateral hearing.	2.10
11/27/2023	V. Driver	B320/	Initial review of UCC draft plan.	1.50
11/27/2023	D. Harlan	B110/	Attend FSS and Debtor hearing.	3.00
11/27/2023	D. Harlan	B190/	Perform document review.	3.80
11/27/2023	D. Harlan	B190/	Draft proffer regarding contracts under motion to reject.	0.80
11/27/2023	E. Weaver	B110/	Finalize and submit proposed order granting motion for status conference (.2); telephone call with court coordinator regarding same (.1); draft, finalize and file notice of status conference for 11-27-2023 (.5).	0.80
11/27/2023	J. Yoon	B190/	Review docket and call the Court regarding the proposed agreed orders extending reply brief deadlines.	0.40

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Responsible Attorney

Vickie L. Driver

Post - petition

11/27/2023	J. Yoon	B320/	Review and revise Notice of Status Conference regarding plan proposal.	0.30
11/28/2023	N. Collins	B240/	Evaluate tax status and personal property renditions for debt-related entity.	2.60
11/28/2023	V. Driver	B190/	Preparation for and attend deposition of R. Schleizer.	7.50
11/28/2023	V. Driver	B190/	Email to Dr. Jones' counsel on need to refund expenses due from Trust owning condos.	0.10
11/28/2023	V. Driver	B195/	Travel from Houston. (billed at half time 3.7)	1.80
11/28/2023	D. Harlan	B190/	Perform document review.	2.40
11/28/2023	D. Harlan	B190/	Attend deposition of R. Schleizer.	7.50
11/28/2023	E. Weaver	B170/	Review seventh, eighth and ninth monthly fee statements for Teneo Capital for compliance with fee guidelines.	4.00
11/28/2023	J. Yoon	B190/	Check status of proposed agreed orders extending reply briefing deadlines in the Connecticut and Texas interlocutory appeals.	0.30
11/28/2023	J. Yoon	B240/	Research and analyze tax issues.	2.50
11/29/2023	J. Davis	B190/	Review of the two court orders which grant additional time to file reply brief in support of our Motion for Leave to File Appeal.	0.10

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Responsible Attorney

Vickie L. Driver

Post - petition

11/29/2023	V. Driver	B160/	Emailing BBA on app to employ brokers and status.	0.20
11/29/2023	V. Driver	B190/	Call with PQPR counsel on status of adversary case and service issues.	0.70
11/29/2023	V. Driver	B320/	Review and comment to plan confirmation scheduling order.	0.60
11/29/2023	D. Harlan	B190/	Finishing review of privileged documents in anticipation of privilege log prep.	6.40
11/29/2023	D. Harlan	B195/	Travel back to Dallas from Houston (3.7). [Billed at half time]	1.80
11/29/2023	E. Weaver	B170/	Review spreadsheet of fee detail for the Teneo Capital fee statements and mark time entries for objection (3.0); revise and update spreadsheet (.8).	3.80
11/29/2023	J. Yoon	B190/	Contact the Court regarding reply brief extensions.	0.20
11/30/2023	V. Driver	B190/	Emails with counsel for UCC on KJ bankruptcy case (.2); emails with CH 13 trustee in CH 13 case (.2); call with FSS counsel on CH 13 case (.4); call with PQPR counsel on KJ case (.3).	1.10
11/30/2023	D. Harlan	B190/	Perform document review.	4.20
11/30/2023	E. Weaver	B110/	Compile and circulate all bank statements and other requested bank information to trustee via files share.	2.00

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Responsible Attorney

Vickie L. Driver

Post - petition

11/30/2023	E. Weaver	B110/	Review proposed agreed scheduling order and circulate to team.	0.20
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Total Hours	1,113.80
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Total Fees for this Invoice

\$508,228.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	77.50	42,513.50	Bankruptcy - Case Administration
B120	8.90	4,712.50	Bankruptcy - Asset Analysis and Recovery
B130	14.70	8,994.50	Bankruptcy - Asset Disposition
B140	0.30	238.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B150	3.10	1,651.00	Bankruptcy - Meetings of and Communications with Creditors
B160	74.80	31,876.00	Bankruptcy - Fee/Employment Applications
B170	9.60	3,420.00	Bankruptcy - Fee/Employment Objections
B185	11.70	5,958.00	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	647.10	261,202.00	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	38.50	26,894.00	Bankruptcy - Non-Working

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
			Travel
B210	42.40	26,029.50	Bankruptcy - Business Operations
B230	1.70	1,094.00	Bankruptcy - Financing/Cash Collections
B240	30.50	18,754.50	Bankruptcy - Tax Issues
B310	12.60	8,789.00	Bankruptcy - Claims Administration and Objections
B320	140.40	66,101.00	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	1113.80	\$508,228.00	

10/03/2023	Harlan, Danielle reimbursement of travel expenses to Austin and Houston Texas for depositions 9/26-28/2023; transportation \$ 743.80 and meal \$ 44.70	\$788.50
10/05/2023	Digital Mountain for Electronic Discovery/ProtonMail collection	300.00
10/05/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of September 2023	4,940.00
10/11/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for meeting with client regarding litigation preparation 1/24-26/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 898.73 and meal \$ 52.07	1,215.42
10/11/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for SUBV Trustee Meeting 2/13-15/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 1253.63 and meals \$ 246.70	1,764.95
10/11/2023	Driver , Vickie reimbursement of additional expenses to Austin Texas 2/21-24/2023; 404 miles x .655/mile= \$ 264.62, transportation	730.20

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

\$ 120.99 lodging \$ 209.12 and meals \$ 135.47

10/11/2023	VENDOR: Federal Express Corporation; INVOICE#: 829149244; DATE: 10/20/2023 - Federal Express delivery to Vickier Driver, 304 E. Cesar Chavez, Austin, TX 78701 on 10/12/2023	101.72
10/12/2023	Driver , Vickie reimbursement of additional travel expenses with Amanda Finch to Austin, TX for client meetings 3/7-8/2023; transportation \$ 516.00	516.00
10/17/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for client meeting 4/24-25/2023; lodging \$ 755.94	755.94
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meeting 3/29-30/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 842.00 and meals \$ 52.18	1,158.80
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meeting 4/11-13/2023; transportation \$ 540.05, lodging \$ 418.87 and meals \$ 47.04	1,005.96
10/18/2023	Driver , Vickie reimbursement of travel expenses to Los Angeles, California for deposition 5/17-18/2023; transportation \$ 470.28 and lodging \$ 340.45	810.73
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 6/28-29/2023; transportation \$ 451.65, lodging \$ 281.25 and meals \$ 94.22	827.12
10/18/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for client meetings 10/1-4/2023; 404 miles x .655/mile= \$ 264.62, lodging \$ 996.37 and meals \$ 71.52	1,332.51
10/18/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for client meetings 10/10/2023; lodging \$ 380.25	380.25
10/24/2023	Proton email upgrade for Digital Mountain email collection 9/29/2023	4.99
10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 8/30/2023 through 9/1/2023; 402 miles x .655/mile= \$ 263.31 and lodging \$ 465.47	728.78

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Responsible Attorney

Vickie L. Driver

Post - petition

10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for depositions 9/10-14/2023; 402 miles x .655/mile= \$ 263.61, lodging \$ 772.97 and meals \$ 330.66	1,366.94
10/31/2023	Driver , Vickie reimbursement of travel expenses to Austin Texas for deposition 9/26-28/2023; transportation \$ 712.75, lodging \$ 1127.88 and meal \$ 91.44	1,932.07
10/31/2023	Harlan, Danielle reimbursement of travel expenses to Austin Texas for depositions 10/23-25/2023; transportation \$ 14.77, meals 158.84 and supplies \$ 50.29	223.90
11/06/2023	Everlaw- eDiscovery Data Hosting and Storage for subscription database for the month of October 2023	5,005.00
11/13/2023	Driver , Vickie reimbursement of travel expenses to Houston Texas for depositions 11/1/2023; transportation \$ 487.96 and meals \$ 91.80	579.76
11/13/2023	Driver , Vickie reimbursement of travel expenses to New York for Negotiations 11/7-9/2023; transportation \$ 955.03, lodging \$ 1349.19 and meals \$ 91.58	2,395.80
11/13/2023	Harlan, Danielle reimbursement of working lunch during deposition 11/8/2023	58.71
11/22/2023	Access Transcripts for copy of Hearing Transcript 11/1/2023	182.25
11/22/2023	Texas Southern Bankruptcy Court for filing fee 11/2/2023	298.00
11/22/2023	Texas Southern Bankruptcy Court for filing fee 11/2/2023	298.00
11/29/2023	Driver , Vickie reimbursement of travel expenses to Houston Texas regarding Settlement Negotiations 11/26-29/2023; transportation \$ 534.18, lodging \$ 760.68 and meals \$ 129.39	1,424.25

Subtotal of Expenses

\$31,126.55

Online Research

\$1.20

Subtotal of Costs

\$1.20

Total Expenses and Costs for this Invoice

\$31,127.75

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E102	182.25	Outside printing
E106	1.20	On-line research
E107	101.72	Delivery services/messengers
E110	19,937.88	Out-of-town travel
E111	58.71	Meals
E112	596.00	Court fees
E118	9,945.00	Litigation support vendors
E123	304.99	Other professionals
Total	<u>\$31,127.75</u>	

Total For This Invoice

\$539,355.75

Jones, Alex "AJ"

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
C. Ottaway	1.60	525.00	840.00
L. Dauphin	2.30	185.00	425.50
T. Rinck	7.50	200.00	1,500.00
D. McClellan	106.30	310.00	32,953.00
C. Campbell	0.10	265.00	26.50
V. Driver	233.30	795.00	185,473.50
C. Stephenson	137.00	715.00	97,955.00
J. Booth	0.40	265.00	106.00
C. Chamberlain	0.10	275.00	27.50
E. Weaver	78.40	295.00	23,128.00
C. McDonald	2.10	255.00	535.50
J. Jones	12.40	235.00	2,914.00
R. Yates	40.30	340.00	13,702.00
N. Collins	20.70	675.00	13,972.50
J. Davis	11.40	475.00	5,415.00
J. Yoon	96.40	285.00	27,474.00
D. Harlan	363.50	280.00	101,780.00
Total	1,113.80		\$508,228.00